

**REMARKS**

Claims 1-27 remain pending.

**Claims 1, 2 and 5-7 over Ho**

In the Office Action, claims 1, 2 and 5-7 were rejected under 35 U.S.C. §102(b) as allegedly being anticipated by UK Patent Application No. GB 2,319,747 A to Ho (“Ho”). The Applicants respectfully traverse the rejection.

Claims 1, 2 and 5-7 recite an electronic wireless badge device displaying user identification information received by a wireless front end.

The Examiner alleges that Applicant’s recited wireless front end reads on Ho’s item 20, a very important aspect of the claims (Office Action, page 2). The Applicants respectfully disagree.

Ho’s item 20 is a LCD **NOT** a wireless front end as alleged (Ho, page 6, line 13). Ho discloses when a worker clocks in at an attendance time clock when arriving at a premises, the security card is entered into a card reader 42 (Ho, page 7, lines 13-33). Thus, Ho discloses that the security card must use physical contact to communicate with another device as shown in Fig. 3. Ho fails to disclose or suggest an electronic badge having any wireless communication capability, i.e., comprising a wireless front end, as recited by claims 1, 2 and 5-7.

Ho discloses an electronic badge consisting of two portions, i.e., an IC card 14 and a card holder 12 (Ho, Fig. 1). When the IC card is inserted into the card holder, circuit elements of the IC card and the card holder communicate (Ho, page 5, line 34-page 6, line 2). The information from the IC card is displayed on the card holder LCD (Ho, page 6, lines 2-6). Thus, Ho’s IC card communicates with a card holder through physical contact. Since Ho fails to disclose an IC card having wireless capability, the IC card can **ONLY** receive user identification information through physical contact. An IC card receiving user identification information through physical contact is **NOT** an electronic wireless badge device displaying user identification information received by a wireless front end, as recited by claims 1, 2 and 5-7.

A benefit of transferring a graphical representation to a electronic wireless badge device is, e.g., use with multiple wearers. Places that issue

badges temporarily during a course of a day typically reuse badges. Utilizing an electronic badge that receives a graphical representation wirelessly allows such places to change the graphical representation numerous times throughout a day while still being accurate for a particular user. Wireless transmission allows convenient transfer of a graphical representation with no delays for a wearer. Moreover, the user identification information can be updated while a wearer is anywhere within a facility to indicate such information as the wearer is a security risk. Such advantages are not taught or suggested by Ho, much less any of the other cited prior art.

For at least the foregoing reasons, claims 1, 2 and 5-7 are patentable over the prior art of record. Accordingly, the Applicants respectfully request that the foregoing rejection be withdrawn.

**Claims 3, 8, 9, 11-27 over Ho in view of Tuttle**

Claims 3, 8, 9 and 11-27 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over Ho in view of U.S. Patent No. 6,246,376 to Bork et al. ("Bork"). The Applicants respectfully traverse the rejection.

Claims 3, 9, 11, 13-10 and 21-27 are dependent on claims 1, 8, 12 and 20 and are patentable over Ho in view of Tuttle for the same reasons as claims 1, 8, 12 and 20.

Claims 3, 8, 9 and 11-27 respectively recite displaying user identification information of a wearer of an electronic wireless badge device on an electronic display transmitted to and received by the electronic wireless badge device wirelessly.

As discussed above, Ho fails to disclose an electronic badge having wireless communication capability, much less displaying user identification information of a wearer of an electronic wireless badge device on an electronic display transmitted to and received by the electronic wireless badge device wirelessly, as claimed by claims 3, 8, 9 and 11-27.

The Office Action relies on Tuttle to allegedly make up for the deficiencies in Ho to arrive at the claimed invention. The Applicants respectfully disagree.

Tuttle is relied on to disclose a network security station comprising a database (Office Action, page 3). Tuttle discloses a portable wireless transponder device borne by an individual for locating the individual in a facility (Tuttle, Abstract). The portable wireless transponder device can be embedded in a badge that includes a photograph 38 of the bearer (Tuttle, col. 4, lines 12-14).

Thus, although Tuttle discloses a badge that has a wireless front end, the wireless front end is only used to determine the location of the badge within a facility. Tuttle's badge relies on a photograph to identify the wearer of the badge. Tuttle fails to disclose or suggest an wirelessly transferring user identification information to an electronic badge, much less displaying user identification information of a wearer of an electronic wireless badge device on an electronic display transmitted to and received by the electronic wireless badge device wirelessly, as recited by claims 3, 8, 9 and 11-27.

Neither Ho nor Tuttle, either alone or in combination, disclose, teach or suggest wireless transfer of user identification information to an electronic badge device, i.e., displaying user identification information of a wearer of an electronic wireless badge device on an electronic display transmitted to and received by the electronic wireless badge device wirelessly, as recited by claims 3, 8, 9 and 11-27.

For at least the foregoing reasons, claims 3, 8, 9 and 11-27 are patentable over the prior art of record. Accordingly, the Applicants respectfully request that the foregoing rejection be withdrawn.

#### **Claim 4 over Ho in view of Bork**

In the Office Action, claim 4 was rejected under 35 U.S.C. §103(a) as allegedly being obvious over Ho in view of U.S. Patent No. 6,246,376 to Bork et al. ("Bork"). The Applicants respectfully traverse the rejection.

Claim 4 is dependent on claim 1, and is patentable over Ho for the same reasons as claim 1.

Claim 4 recites an electronic wireless badge device displaying user identification information received by a wireless front end.

As discussed above, Ho fails to disclose or suggest an electronic

badge with wireless communication capability, much less an electronic wireless badge device displaying user identification information received by a wireless front end, as recited by claim 4.

The Office Action relies on Bork to allegedly make up for the deficiencies in Ho to arrive at the features claimed. The Applicants respectfully disagree.

Bork is relied on by the Examiner to disclose a wireless piconet front end is a BLUETOOTH device (Office Action, page 6). However, Bork's invention is directed toward determining the transfer of location information between two BLUETOOTH devices (Abstract). Thus, Bork's invention transfers location information to a BLUETOOTH device, failing to disclose or suggest transferring user identification information to a wireless device, as recited by claim 4.

Moreover, there is no suggestion of modifying Ho, a system relying on physical contacts, with a features from a wireless system for determining the location of wireless devices relative to one another. Ho does not need to determine the location of the electronic badge since the location of the electronic badge is known once it makes physical contract for the transfer of information. Therefore, modifying Ho that relies on physical contacts to transfer information to an electronic badge with Bork's features of wireless transfer of location information to determine the location of the wireless badge relative to other wireless badges is **nonsensical** and would still not result the claimed features.

Thus, Ho modified by Bork still fails to disclose or suggest wirelessly transferring user identification information to an electronic badge, i.e., an electronic wireless badge device displaying user identification information received by a wireless front end, as recited by claim 4.

For at least the foregoing reasons, claim 4 is patentable over the prior art of record. Accordingly, the Applicants respectfully request that the foregoing rejection be withdrawn.

**Claim 10 over Ho in view of Tuttle and Bork**

Claim 10 was rejected under 35 U.S.C. §103(a) as allegedly being obvious over Ho in view of Tuttle and Bork. The Applicants respectfully traverse the rejection.

Claim 10 is dependent on claim 8, and is patentable over Ho in view of Tuttle and Bork for the same reasons as claim 8.

Claim 10 recites displaying user identification information of a wearer of an electronic wireless badge device on an electronic display **transmitted to the electronic wireless badge device wirelessly.**

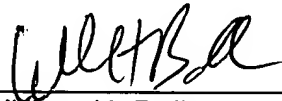
As discussed above, Ho fails to disclose or suggest an electronic badge having wireless communication capability. Thus, Ho modified by Tuttle and Bork still fails to disclose or suggest wirelessly transferring user identification information to an electronic badge, i.e., displaying user identification information of a wearer of an electronic wireless badge device on an electronic display transmitted to the electronic wireless badge device wirelessly, as claimed by claim 10.

For at least the foregoing reasons, claim 10 are patentable over the prior art of record. Accordingly, the Applicants respectfully request that the foregoing rejection be withdrawn.

**Conclusion**

All objections and rejections having been addressed, it is respectfully submitted that the subject application is in condition for allowance and a Notice to that effect is earnestly solicited.

Respectfully submitted,

  
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William H. Bollman  
Reg. No. 36,457

**Manelli Denison & Selter PLLC**  
2000 M Street, NW Suite 700  
Washington, DC 20036-3307  
TEL. (202) 261-1020  
FAX. (202) 887-0336

WHB/df